



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

via e-mail

September 14, 2016

FPU17-075

Ms. Catherine Jerrard
AFCEC/CIBW
706 Hangar Road
Rome, NY 13441

RE: WAFB – ADEQ Comments – FYR- *Draft Fourth Five-Year Review Report [basewide 4th FYR], Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center AFCEC/CIBW, Lackland AFB, Texas; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc., Phoenix, Arizona; document dated Aug. 8, 2016.

Dear Ms. Jerrard:

Arizona Department of Environmental Quality (ADEQ) Federal Projects Unit (FPU) and ADEQ contractor UXO Pro, Inc. reviewed the referenced document. ADEQ's comments are presented below:

General Comments

Protectiveness Statements – ADEQ has significant concerns regarding the OU-2 ROD Amendment 2 remedy's long-term protectiveness. Contamination remains following the steam enhanced extraction (SEE) process. Contaminant extent is interpreted to not be characterized and contaminant migration containment has not been proven. Therefore, the proposed enhanced bioremediation (EBR) and monitored natural attenuation (MNA) effectiveness is uncertain.

Specific Comments

1. Page ES-7, Five-Year Review Summary Form; *Issues/Recommendations*; from lines 431 to 432: State residual LNAPL remains within the treatment zones and discuss as part of the OU-2 Steam Enhanced Extraction (SEE) remedy performance presentation.
2. Page 1-1, Section 1.1, lines 449-450. Please replace the phrase "whether the remedy at a site is or is not expected to be" with "if the remedy is or will be".
3. Table 1-1, page 1-6. Site DP at Building 1069. Please clarify the reference for the quoted text. The formatting makes it unclear if this quote is from the subsequent reference to BEM, 2005.
4. Page 4-16, Section 4.2.4.2, line 1792. Please revise the phrase "above below" as appropriate.

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5. Page 7-15, first bullet; lines 2569 thru 2576; *Early Indicators of Potential Issues*: Please identify the dissolved phase constituents' offsite extent as an issue.

Closure

ADEQ may add or amend our comments if evidence to the contrary of our understanding is discovered; if received information is determined to be inaccurate; if any condition was unknown to ADEQ at the time this document was signed; or if other parties bring valid and proven concerns to our attention; and/or site conditions are deemed not protective of human health and the environment, within the scope of this Agency.

Thank you for the opportunity to comment. Should you have any questions regarding this correspondence, please contact me by phone at (602) 771-4121 or e-mail miller.wayne@azdeq.gov.

Sincerely,



Wayne Miller
ADEQ Project Manager, Federal Projects Unit
Remedial Projects Section, Waste Programs Division

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	ADEQ Reading and Project File	